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April 24, 2006

**BY ELECTRONIC SUBMISSION**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC 20054

Re: NOTICE OF EX PARTE COMMUNICATION  
*Country Code 1 ENUM LLC's Petition for Limited Waiver, CC Docket 99-200*

Dear Ms. Dortch:

On Friday, March 23, 2006, Steven Lind, James Baskin, Penn Pfautz of Country Code 1 ENUM LLC ("CC1 ENUM") and I met with Ann Stevens, Associate Chief, Competition Policy Division, Wireline Competition Bureau; Mary McManus, Attorney, Competition Policy Division, Wireline Competition Bureau; Heather Hendrickson, Attorney, Competition Policy Division and Sanford Williams, currently of the Commission's Office of Managing Director (previously an attorney in the Wireline Competition Bureau). Mr. Williams participated in the meeting by telephone.

We discussed the above-referenced Petition, in which CC1 ENUM requests a limited waiver of section 52.15(g) of the Commission's numbering rules to allow CC1 ENUM to obtain numbering resources directly from the Pooling Administrator, to be used in conjunction with a trial of ENUM technology within the Country Code 1 North American Numbering Plan. We reiterated the substance of the request in the Petition. In addition, we discussed the CC1 U.S. ENUM Trial Block Allocation & Number Administration Procedures, which is attached as Exhibit 11 to the Petition. For reference, an additional copy of the procedures document is attached.

We also discussed the anticipated schedule of the proposed trial, and the status of the trial plans. We stated that the Trial Participants Advisory Committee is in the process of developing detailed test cases, as well as a testing schedule, and will probably not be in a position to use the

numbering resources for about one month. We stated that the trial schedule is subject to change as trial plans develop, but that schedule information is made available in the timeline on CC1 ENUM's Worldwide Web site, <http://www.enumllc.com>. Finally, we discussed the period established by the Commission for comments regarding the Petition, and for replies to any such comments.

Pursuant to the Commission's rules, this letter is being filed electronically via the Commission's ECFS system. Should you have any questions regarding this letter, please feel free to contact me at your convenience.

Respectfully,



Katherine R. Blanchette

Attachment

cc: Mr. Steven D. Lind, Vice Chairman CC1-ENUM LLC

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# CC1 U.S. ENUM Trial Block Allocation & Number Administration Procedures

## *Introduction*

In the *Terms and Conditions for a U.S. Trial of ENUM* provided in Ambassador Gross' letter of September 2, 2005, conditions 4 and 5 speak to the numbering resources to be used in the trial:

4. Prior to the commencement of the trial, the ENUM LLC must apply to the Federal Communications Commission (FCC) for approval of an assignment of numbers from geographic Numbering Plan Area's (NPA's) in the U.S., for use in the U.S. ENUM trial. These numbers may be distributed appropriately to U.S. trial participants, but not to end users or consumers not affiliated with the trial participants. For example, trial participants may allow their employees to use the numbers on a temporary basis only. Use of any other U.S. numbers in this trial is prohibited.
5. The ENUM LLC is only permitted to apply for or use geographic numbers which have been approved by the FCC for the U.S. ENUM trial. Use of non-geographic numbers in this trial is prohibited.

## *Numbering Scenario*

Based on the above conditions and subsequent discussions, the LLC proposes the following scenario for trial number assignment:

- The LLC will request pursuant to condition 4 above that the FCC direct the Pooling Administrator (PA) to assign at the direction of the LLC some maximum number of new thousands blocks (NPA-NXX-Xs) from codes already opened in the PSTN for use in the trial.
- The request will stipulate that blocks will only be requested as needed to accommodate new participating carriers and/or rate centers.
- The LLC will then make a request to the PA assign blocks within the allocation to specific service providers for use in the trial.
- The service providers will then request the corresponding blocks from the PA using current methods and procedures except that assignment will be exempted from the normal utilization thresholding since they are for trial use.
- Service providers will provision the blocks in their networks but restrict number assignments from the blocks to bona fide trial participants that the LLC has verified have signed the trial MOU agreeing to the USG's terms and conditions. Service providers will report assignments to the LLC.
- The trial MOU will stipulate that trial participants will not assign trial numbers to non trial participants such as their customers, tenants, or students.
- To optimize use of numbering resources, the LLC working through participating carriers, may in some instances assign individual numbers from trial blocks associated with a rate centers other than that in which the participant is located. The PSTN point of interface for the block will always be appropriate to the rate center with the block is associated.

- As additional participants/locations join the trial, the LLC will request new block assignments from the PA not to exceed the total allocation ordered by the FCC.
- Registrars and the Tier 1B Registry will likewise be bound to accept registrations only for numbers in the thousands blocks allocated for the trial.
- On a monthly basis the LLC will report to the FCC the current set of block allocations and number assignments in use in the trial.

## **Procedures for Block Allocation**

1. The Trial Participants Advisory Committee (TPAC), consisting of participants that have signed the trial MoU committing to observe all of the terms and conditions set forth by the USG, will determine the rate centers in which numbering resources are required and the participating carriers that agree host the corresponding blocks.
2. The LLC will review the TPAC's recommendation and, upon approval send a request to the PA. The request will include a copy of the FCC waiver under which the blocks are being requested and list the rate centers and associated host carriers to which the blocks are to be assigned. At the same time, a copy of the request will be sent to the FCC.
3. The host carriers will submit applications as normally but noting that the applications are trial blocks pursuant to the waiver and provide a copy of the LLC's request.

## **Procedures for Number Assignment**

1. Once blocks have been assigned by the PA, participating carriers will implement them in their networks under normal procedures but will make no number assignments from them.
2. Trial participants will request numbers for use in the trial from the TPAC. The request form will require indication of where the number will be assigned (e.g., lab, employee office, etc.) and certification that the number will not be assigned to an end user.
3. After review the TPAC will forward the request to the appropriate participating carrier, indicating the trial block from which the number should be assigned.
4. The host carrier will assign numbers and notify the trial participant, TPAC, and LLC of the assignment made.
5. The LLC will include the number assignments made in its monthly report to the FCC.

## **Procedures for Return of Blocks**

At the end of the trial the LLC will contact the PA and indicate that the blocks assigned are to be returned and provide a corresponding list. The participating carriers will assist as necessary in the return process. The PA will notify the LLC and FCC once the blocks have been returned.